

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Cause No. 05-CR-1949-JH

BILL JONES,

Defendant

DEFENDANT BILL JONES' MOTION TO
REVIEW CONDITIONS OF RELEASE
AND FOR MODIFICATION

The Defendant Bill Jones, through his attorney of record, Victor K. Sizemore, files this motion requesting the Court to review his conditions of release and modify the same representing to the Court as follows:

1. Defendant has been in custody since March, 2007, now over one (1) year without bond.
2. As the Court is aware, these proceedings were stayed pursuant to co-defendant's appeals; and further, Jones was not arrested until approximately one and one-half years after this litigation began. There are other appeals pending on co-defendants, further discovery is still being furnished by the government and the case has not been set for trial.
3. Counsel has communicated with the pre-trial services officer on several occasions in this case, Andrew Self, and it is anticipated that he will recommend release to a suitable third party custodian, Ms, Gail Robinson who has been a close friend to the defendant for a long period of time. Pre-trial services has contacted the proposed third party custodian and will

furnish the Court appropriate information regarding her qualifications.

4. AUSA James Braun has also been contacted and upon review of this motion and pre-trial services recommendation, it is anticipated that the government will not oppose.

5. Counsel has personally met with the defendant and the proposed third party custodian/surety and explained their duties, responsibilities and the consequences if either one does not strictly adhere to the conditions of release imposed by the Court and understand completely.

WHEREFORE, Defendant Jones respectfully requests the Court to consider his motion and to release him pursuant to the recommendations of pre-trial services under and all other terms and conditions which the Court orders.

Respectfully submitted,

Electronically filed 4-8-08
VICTOR K. SIZEMORE
Attorney for Defendant Jones
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I hereby certify that a true and accurate copy of the foregoing was emailed by CM/EDF to AUSA James Braun on this 8th day of April, 2008.

Electronically filed 4-8-08
Victor K. Sizemore